

ORIGINAL

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

RECEIVED
MAY 20 1996
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of:)

Implementation of the Local)
Competition Provisions in the)
Telecommunications Act of 1966)

CC Docket No. 96-98

DOCKET FILE COPY ORIGINAL

COMMENTS

GTE SERVICE CORPORATION,
on behalf of its affiliated domestic
telephone operating and wireless
companies

R. Michael Senkowski
Robert J. Butler
Angela N. Watkins
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7000

David J. Gudino
GTE SERVICE CORPORATION
1850 M Street, N.W.
Suite 1200
Washington, D.C. 20036
(202) 463-5212

Date: May 20, 1996

No. of Copies rec'd. 0216
List A B C D E

TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	iii
I. THE COMMISSION'S EXISTING RULES AND POLICIES FOR NOTICE AND DISCLOSURE OBLIGATIONS REGARDING TECHNICAL CHANGES PROVIDE A SATISFACTORY MODEL (¶¶ 189-194)	2
A. Only Minor Changes to Existing FCC Rules Are Necessary to Ensure Adequate Disclosure of Network Information	3
B. The Commission Should Require the Disclosure Only of Necessary Information	5
C. Public Notice of Technical Changes Should Be Provided Through Industry Forums and in Industry	7
II. THE FCC'S DIALING PARITY GUIDELINES SHOULD BE PRAGMATIC, SIMPLE, FLEXIBLE AND COST EFFECTIVE (¶¶ 202-213)	7
A. The Commission Has Identified Acceptable Outcomes for Defining Dialing Parity	7
B. The Commission Should Establish Flexible Guidelines to Enable the States to Implement Dialing Parity	8
III. GTE SUPPORTS NONDISCRIMINATORY ACCESS TO TELEPHONE NUMBERS AND DIRECTORY AND OPERATOR ASSISTANCE SERVICES AND FUNCTIONS (¶¶ 214-219)	13
IV. THE COMMISSION NEED NOT PRESCRIBE DETAILED NEW RULES TO GOVERN ACCESS TO POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY BEYOND THOSE NEEDED TO FORMULATE APPLICABLE RATES (¶¶ 221-225)	21

Page

V.	THE COMMISSION SHOULD MOVE EXPEDITIOUSLY TO FULFILL PREVIOUSLY-ESTABLISHED DIRECTIVES RELATED TO NUMBER ADMINISTRATION (§§ 250-259)	29
VI.	CONCLUSION	31

EXECUTIVE SUMMARY

GTE submits that the Commission should avoid prescribing detailed requirements for implementation of the interconnection provisions of the Telecommunications Act of 1996 ("1996 Act") and, instead, seek to identify acceptable outcomes within reasonable boundaries that will facilitate the negotiation of interconnection agreements between interested parties. Addressing network disclosure, dialing parity, access to rights-of-way, and numbering administration issues within this framework will best effectuate the 1996 Act's goals.

First, existing notice and disclosure obligations regarding network modifications can easily be amended to ensure an adequate level of information dissemination. If applied evenhandedly to all interconnecting carriers, the *Computer II*, Part 68, and ONA requirements for release of information regarding changes in the network would effectively promote competition. Such disclosure requirements should attach only to information necessary for interconnection, should not impinge upon legitimate proprietary interests, and should be effectuated through traditional industry forums and publications.

Second, GTE agrees with the Commission's definition of dialing parity as requiring equal digit access to the customers of all carriers. Although presubscription remains the best method for achieving dialing parity for toll

services, the Commission should not mandate a particular scheme, but allow the involved state agency to balance cost and value. GTE is moving forward expeditiously with its own plan on a nationwide basis. The Commission should reserve jurisdiction to address any state requirement that is not reasonably consistent with industry practices or is completely out of step with other states' programs. Moreover, given the other requirements of the 1996 Act and the substantial state activity involving dialing parity, there is no need for the agency to establish an implementation schedule, to require particular selection procedures such as balloting, or to impose additional consumer education requirements.

GTE currently provides and will continue to support nondiscriminatory access to numbering, directory and operator assistance services and functions. The 1996 Act requires only that new entrants receive the same access a LEC receives with respect to telephone numbers, operator services, directory assistance and directory listings. Detailed new rules are not needed to achieve these objectives. Industry guidelines and FCC rules already ensure access to telephone numbers, and GTE makes directory and operator services available to non-affiliated carriers and their customers. Such services are available from other providers as well. Notably, however, facilities-based carriers remain responsible for ensuring nondiscriminatory dialing access to these offerings.

The Commission also need not address the question of dialing delay at this time. Any action by the agency should await deployment of new network

systems, such as those enabling number portability, and should separately evaluate delay performance for those parts of a transmission that are under the control of each participating service provider. Full cost recovery for dialing parity implementation should also be guaranteed.

Third, ensuring nondiscriminatory access to poles, conduits, and rights-of-way should largely be left to private negotiations under state review. The FCC's experience with cable television pole attachment regulation has demonstrated that general guidelines rather than specific regulations will be most effective in providing direction to the marketplace. The provisions of the 1996 Act do not support the FCC's suggestion that nondiscriminatory access might require that an owner apply to itself the same terms and conditions that it applies to others. Moreover, access can reasonably be denied where it would create a hazardous situation or where capacity beyond that needed by the facility owner is not available. Specific regulations governing what constitutes a "hazard" or how capacity must be allocated are unnecessary and likely would prove impractical. Notice of and apportionment of the cost for alterations or modifications to such facilities are likewise best resolved through negotiations.

Finally, the Commission should move expeditiously to implement its prior decisions regarding number administration. Specifically, the North American Numbering Council ("NANC") should promptly be named and directed to proceed with the selection of the new North American Numbering Plan ("NANP")

Comments of GTE Service Corporation, May 20,

administrator. The agency's proposal for delegation of interim administration functions and the requirements of the *NANP Order* regarding cost recovery fully satisfy the other requirements of the 1996 Act.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of the Local)	CC Docket No. 96-98
Competition Provisions in the)	
Telecommunications Act of 1996)	

COMMENTS OF GTE

GTE Service Corporation ("GTE"), by its attorneys and on behalf of its affiliated domestic telephone operating and wireless companies, respectfully submits its comments in response to the above-captioned Notice of Proposed Rulemaking.¹ As requested by the Commission, these comments address the following issues: (1) public notice of technical changes; (2) dialing parity; (3) access to rights-of-way; and (4) number administration.

GTE filed separate comments responding to the other aspects of the *NPRM*. In those earlier comments, GTE encouraged the Commission to identify acceptable outcomes within reasonable boundaries for interconnection-related issues that recognize the 1996 Telecommunications Act's ("1996 Act") focus on

¹ FCC 96-182 (released April 19, 1996) ("*NPRM*").

individualized negotiation of interconnection agreements between interested parties subject to state review, rather than establishing detailed, uniform national mandatory standards. Unlike many aspects of the Commission's proposals in the *NPRM*, such an approach would best effectuate the 1996 Act's goals, consistent with jurisdictional comity and the limits on FCC resources.

**I. THE COMMISSION'S EXISTING RULES AND POLICIES
FOR NOTICE AND DISCLOSURE OBLIGATIONS REGARDING
TECHNICAL CHANGES PROVIDE A SATISFACTORY MODEL
(¶¶ 189-194)**

Section 251(c)(5) of the 1996 Act imposes upon incumbent LECs the duty to provide notice of technical changes in their facilities and networks.² Specifically, the 1996 Act requires those carriers "to provide reasonable public notice of changes in the information necessary for the transmission and routing of services using that local exchange carrier's facilities or networks, as well as of any other changes that would affect the interoperability of those facilities and networks."³ To comply with this requirement, the Commission proposes to require incumbent LECs to disclose all information relating to network design and

² § 251(c)(5).

³ *Id.*

technical standards as well as information concerning changes to the network that affect interconnection. (§ 190)

GTE submits that the Commission's existing rules and policies regarding notice and disclosure are sufficient for application in this context, if applied to all LECs. Accordingly, there is no need to expend resources and time inventing a new regulatory framework. The current regime already ensures the free flow of information necessary to secure workable interconnection options for new entrants and, thereby, to promote competition in local markets as envisioned by Congress.

A. Only Minor Changes to Existing FCC Rules Are Necessary to Ensure Adequate Disclosure of Network Information

The Commission's existing information disclosure requirements are contained in three places. The first is set out in 47 C.F.R. § 64.702(d)(2), which closely parallels section 251(c)(5) of the 1996 Act. This provision requires the disclosure "to the public [of] all information relating to network design and technical standards and information affecting changes to the telecommunications network which would affect either intercarrier interconnection or the manner in which customer-premises equipment is attached to the interstate network prior to

implementation and with reasonable advance notification."⁴ The FCC should make clear that this rule requires disclosure to all interested parties, not just separate subsidiaries.

The second relevant requirement is 47 C.F.R. § 68.110(b), which mandates that when a telephone company makes changes to its facilities, equipment, or operations that "can be reasonably expected to render any customer's terminal equipment incompatible with telephone company communications facilities, or require modification or alteration of such terminal equipment, or otherwise materially affect its use or performance, the customer shall be given adequate notice in writing, to allow the customer an opportunity to maintain uninterrupted service."⁵ This principle could easily be applied to interconnection as well.

The Commission's network disclosure rules under its ONA orders require AT&T, the BOCs, and GTE to disclose information about network changes or new network services that affect the interconnection of enhanced services with the network at two points in time. Carriers must provide such information to manufacturers and enhanced service providers at the "make/buy point" -- that is, when the carrier decides to make itself, or to procure from an unaffiliated entity, any product the design of which affects or relies on a network interface. In

⁴ 47 C.F.R. § 64.702(d)(2).

⁵ 47 C.F.R. § 68.110(b).

addition, those carriers are required to release to the general public all relevant technical information up to twelve months, and no later than six months, before introduction of the new or modified network service. (See ¶ 192)

A synthesis of these requirements will ensure the provision of notice and disclosure of network changes in a manner sufficient to promote competition, but only so long as applied equally to all interconnecting carriers, not simply incumbent LECs. There is no reasonable basis for treating entities differently with respect to these requirements where the ultimate goal of transparent interoperability among local networks requires all interconnectors to cooperate in this manner. For competitive reasons as well, the Commission should not require a select group of telecommunications services providers to provide access to information relating to their network designs and exempt others. Such disparate treatment works against competitive neutrality and regulatory parity. Thus, the existing regulatory framework for network interconnection disclosure will be suitable for achieving and maintaining efficient interconnection only if it is applied even-handedly.

**B. The Commission Should Require the Disclosure
Only of Necessary Information**

GTE recognizes the need for reasonable access to certain technical information to ensure network interoperability, and generally supports such

disclosure. However, the disclosure requirement should not be limitless.

Recognizing that access should not be absolute, the Commission requests comment on the extent to which safeguards may be necessary to ensure that information regarding network security, national security, and proprietary interests of LECs, manufacturers, and others is not compromised. (¶ 194)

In adopting disclosure requirements, the Commission must strike a balance between the information necessary to ensure seamless interconnection and the protection of proprietary information. To this end, the rules must not be too rigid or overly intrusive. Moreover, the rules should not require access to network design information that might deprive a carrier of legitimate property rights without compensation or otherwise award the recipients an unfair competitive advantage.

It follows that the Commission should adopt the approach taken in the *Computer III* proceeding, in which the FCC determined that the network information subject to disclosure did not include all network innovations made by carriers or all the technical characteristics of basic transmission service.⁶ There, the information subject to disclosure was limited to "network changes or new basic services that affect the interconnection of enhanced services with the network."⁷ Any regulatory framework established should encourage carriers to

⁶ See Amendment to Sections 64.702 of the Commission's Rules and Regulations (*Computer III*), Phase II, 2 FCC Rcd 3072, 3087 (1987).

⁷ *Id.*

develop new products and services, while simultaneously maximizing the ability to interconnect.

C. Public Notice of Technical Changes Should Be Provided Through Industry Forums and in Industry Publications

The Commission further seeks commenters' views on how public notice of technical changes should be provided. (¶ 191) GTE supports the Commission's tentative conclusion that full disclosure of the required technical information should be provided through industry forums or in industry publications. These mechanisms have been demonstrated to be appropriate and effective distribution tools. They are already in place, reach the targeted audience, and allow for widespread dissemination.

II. THE FCC'S DIALING PARITY GUIDELINES SHOULD BE PRAGMATIC, SIMPLE, FLEXIBLE AND COST EFFECTIVE (¶¶ 202-213)

A. The Commission Has Identified Acceptable Outcomes for Defining Dialing Parity

Section 251(b)(3) of the 1996 Act requires all LECs "to provide dialing parity to competing providers of telephone exchange service and telephone toll service."⁸

⁸ § 251(b)(3).

The Commission tentatively concludes that, "pursuant to section 251(b)(3), a LEC is required to permit telephone exchange service customers within a defined local calling area to dial the same number of digits to make a local telephone call, notwithstanding the identity of a customer's or the called party's local telephone service provider." (§ 211). GTE agrees with this approach. In other words, consistent with the definition of dialing parity,⁹ users should not be burdened with having to dial additional access codes or personal identification numbers to call the subscribers of another carrier.¹⁰

B. The Commission Should Establish Flexible Guidelines to Enable the States to Implement Dialing Parity

The Commission tentatively concludes that section 251(b)(3) of the 1996 Act requires carriers to provide dialing parity for all telecommunications services that require dialing to route a call. (§ 206) GTE agrees with this interpretation. While GTE also concurs in the Commission's conclusion that presubscription offers the best solution to achieve toll dialing parity, it is not essential to the provision of

⁹ See § 3(15).

¹⁰ So long as new entrants have the technical ability to deploy equipment necessary to offer the same seven-digit dialing as the incumbent LEC, dialing parity should be deemed to exist even if one or more of the new entrants ultimately chooses to provide ten-digit dialing. In other words, such individualized decisions should not be sufficient to shift dialing parity from seven-digit to ten-digit dialing.

equivalent dialing opportunities. For example, a customer that presubscribes to an interLATA carrier can use that carrier to place both domestic interLATA and international calls. The 1996 Act does not require a separate presubscription for each type of calling. As discussed *infra*, the FCC should not mandate any particular number of presubscription categories. Such decisions should be left to the involved state regulatory agency, because it is best positioned to balance the value of additional carrier access choices against the higher administrative and network design costs associated with an increased number of presubscription choices.

In fact, GTE's wireline telephone operating units have already taken steps to implement two-PIC presubscription throughout their serving territories. The Company is moving forward to provide dialing parity for long distance service as quickly and efficiently as possible. Further, the majority of states in which GTE operates either have completed or have ongoing proceedings addressing intraLATA equal access requirements.¹¹ Moreover, in every service area where it is technologically and economically feasible, GTE's wireline telephone operating companies are supporting 1 + /0 + intraLATA presubscription using a full two-PIC methodology. GTE's proposal includes a conversion schedule running from

¹¹ Of the twenty-eight states where GTE provides services, ten have issued an order, one state has completed its activities but has not yet released an order, and seven other states have an active proceeding.

September 1996 through March 1997, assuming relevant state approvals (including tariffs for cost recovery) are obtained. GTE will inform customers and toll carriers of such conversions reasonably in advance of implementation.

The *NPRM* asks whether the FCC should adopt national dialing parity standards. (§ 210) GTE does not believe that national dialing parity standards are necessary. As the Commission correctly notes, "there is substantial variation in the intraLATA toll dialing parity requirements and implementation methodologies that individual states have adopted." (§ 210) States are generally the more appropriate forums for establishing local exchange policies of this type, because commissions are more attuned to local market conditions and service needs, factors that will weigh heavily in evaluating the relative costs and benefits of implementing dialing parity.

The Commission should, however, reserve jurisdiction to address any challenge to a state requirement that is not reasonably consistent with industry practices or is completely out of step with what other states are doing. Radical variations in the requirements for implementing dialing parity, particularly technical variations, will unnecessarily increase overall costs to both providers and their customers. By retaining broad oversight, the Commission can realize the important goal of minimizing technical variations across the states, while simultaneously allowing states the flexibility necessary to address local needs and conditions.

The Commission also seeks comment as to whether a "uniform, nationwide methodology is necessary" for choosing presubscribed carriers. (¶ 210) The Commission should allow states to tailor the presubscription methodology to fit the market.¹² States should not be forced to abandon proven presubscription methods or efforts that may be in various stages of implementation in order to comply with a federal mandate that may or may not efficiently address local needs. Moreover, as noted above, GTE is moving aggressively to coordinate and implement a presubscription plan for each of its wireline local telephone exchange areas. The goal is to establish a schedule that will provide a prompt and smooth transition in every region. It would be inefficient to require GTE and other companies taking similar steps to radically alter their carefully devised plans in order to comply with new regulations or, worst case, restart their efforts from scratch.

The Commission also raises the issue of the advisability of establishing an implementation schedule for dialing parity obligations. (¶ 212) GTE submits that a uniform nationwide implementation schedule is unnecessary. As the Commission noted, some form of intraLATA toll dialing parity is available or has been ordered in

¹² The Commission has previously recognized the need to permit flexibility within its rules to accommodate state agency decisions based upon local needs. *See Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers, Report and Order*, 10 FCC Rcd 9560, 9561 (1995).

18 states (§ 203), and GTE has explained that most of the states in which it operates have or are in the process of adopting such requirements. In addition, section 271(e) details when the BOCs must provide intraLATA toll dialing parity.¹³ Because the states are voluntarily and actively moving toward implementing dialing parity methodologies, and because the 1996 Act explicitly mandates a timeframe for the BOCs, an additional national implementation schedule is not warranted.

The Commission also inquires whether it should require LECs to notify consumers about carrier selection procedures or impose any additional consumer education requirements. (§ 213) The 1996 Act neither mandates nor suggests any such requirement. Again, the states and the carriers are in the best position to determine what measures, if any, should be taken to satisfy public notice or education needs. GTE has undertaken to formally notify carriers of conversion schedules when they are approved, and will similarly inform its local exchange customers prior to implementation of a presubscription option in a converting office.

The Commission should not impose upon LECs a duty to notify customers of competitors' offerings or to participate in any form of balloting. The competition for customers will ensure that each provider makes every effort to notify

¹³ See § 271(e).

customers of who they are, what they have to offer and how their services can be obtained. Moreover, the myriad of marketing, sales and advertising tools at their disposal will be more than sufficient to ensure their success in providing customers all of the information they need to make informed decisions regarding service options. Forcing LECs to incur expenses to market the services of their competitors, as would be the case if balloting were required, would be unfair and anticompetitive.

III. GTE SUPPORTS NONDISCRIMINATORY ACCESS TO TELEPHONE NUMBERS AND DIRECTORY AND OPERATOR ASSISTANCE SERVICES AND FUNCTIONS (§§ 214-219)

In addition to requiring LECs to provide dialing parity, section 251(b)(3) imposes a duty to provide nondiscriminatory access to certain other functions and services. Specifically, section 251(b)(3) requires LECs to provide competing telecommunications services providers with "nondiscriminatory access to telephone numbers, operator services, directory assistance, and directory listing, with no unreasonable dialing delays."¹⁴ The FCC has tentatively concluded that "nondiscriminatory access" means "the same access that the LEC receives with

¹⁴ § 251(b)(3).

respect to such services." (¶ 214) As detailed below, GTE substantially agrees with this characterization.

Nondiscriminatory Access to Telephone Numbers. The FCC interprets "nondiscriminatory access to telephone numbers" to require that competing telecommunications providers be provided access to telephone numbers in the same manner that such numbers are provided to incumbent LECs. (¶ 215) Detailed industry guidelines currently ensure that numbers are distributed to all carriers in a nondiscriminatory fashion by GTE and the BOCs.¹⁵ Moreover, the Commission has already directed that the functions associated with the assignment and administration of local telephone numbers be centralized and transferred from the LECs to a newly created, impartial administrator.¹⁶

In view of the foregoing, the FCC need not promulgate any additional rules in this regard. Instead, in order to fulfill the directives of the 1996 Act and the *NANP Order*, as discussed in more detail below in Section V, the Commission should move promptly to appoint the members of the North American Numbering Council ("NANC") and direct the NANC to select the new number administrator.

¹⁵ See Central Office Code (NXX) Assignment Guidelines, Industry Numbering Committee ("INC"), Industry Carriers Compatibility Forum, Rev. INC 95-0407-008 (April 7, 1995).

¹⁶ See *Administration of the North American Numbering Plan*, 11 FCC Rcd 2588 (1995) ("*NANP Order*") (recon. pending).

Pending the transfer of responsibility to the new administrator, compliance with existing industry guidelines should be deemed sufficient under the 1996 Act.

Nondiscriminatory Access to Operator Services. The FCC construes "nondiscriminatory access . . . to operator services" by LECs to mean, at least in part, that a telephone service customer, regardless of the identity of his local telephone service provider, must be able to connect to a local operator by dialing "0" or "0" plus the desired local telephone number. (¶ 216) The FCC further proposes to define "operator services" as "any automatic or live assistance to a consumer to arrange for billing or completion or both of a telephone call through a method other than: (1) automatic completion with billing to the telephone from which the call originated; or (2) completion through an access code by the consumer, with billing of an account previously established with the telecommunications service provider by the consumer."¹⁷ (¶ 216) The Commission seeks comment on that definition and on what, if any, action is necessary to implement the nondiscriminatory access requirements for this service. (¶ 216)

Given the currently competitive marketplace for operator services, detailed Commission rules are not needed to implement the requirement for

¹⁷ GTE understands that these two methods of billing and call completion excepted from the operator services definition refer to: (1) 1 + dialing and (2) 10XXX or 1-800/1-900 dialing, respectively.

nondiscriminatory access. A new entrant can obtain operator services through a number of sources, including GTE, another competing provider, or self-supply. Moreover, it is important to note that in many instances, GTE obtains operator services from outside sources, including IXCs (*e.g.*, AT&T) and the BOCs.

GTE will negotiate in good faith to provide operator services to similarly-situated local service providers under the same terms and conditions. But, contrary to the suggestion in the *NPRM*, there is no requirement in the 1996 Act that operator services be unbundled, even by the BOCs. (*See* ¶ 116) Moreover, it is ultimately the competing carrier's responsibility to ensure nondiscriminatory access (dial "0" or "0 + ") in a facilities-based arrangement as there is no requirement in the 1996 Act that an incumbent provide operator services directly to its competitors' customers.

GTE submits that these alternatives are more than sufficient under the 1996 Act. Indeed, section 251(b)(3) does not establish a duty to resell operator services. Rather, the definition of operator services in that provision makes clear that it only requires any local exchange carrier that is also an operator services provider to permit equivalent dialing methods to reach such services. Accordingly, consistent with its overall approach to this proceeding, the Commission should allow incumbent LECs to retain the flexibility to provide

operator services on a nondiscriminatory and compensatory basis to anyone requesting such services.

Nondiscriminatory Access to Directory Assistance/Directory Listing. The FCC interprets "nondiscriminatory access to . . . directory assistance and directory listing" to mean "the same access that the LEC receives." (§ 214) In other words, "all telecommunications services providers' customers must be able to access each LEC's directory assistance service and obtain a directory listing in the same manner, notwithstanding (1) the identity of a requesting customer's local telephone service provider, or (2) the identity of the telephone service provider for a customer whose directory listing is requested through directory assistance." (§ 217) The Commission seeks comment on this interpretation and on what, if any, FCC action is necessary to implement such a requirement. (§ 217)

As in the case of operator services, the FCC need not prescribe detailed rules regarding nondiscriminatory access to directory assistance and directory listings. GTE currently performs these functions as a matter of course. Access to directory assistance is currently available from GTE on a nondiscriminatory basis for subscribers of entities marketing either resold GTE services or competitive offerings utilizing unbundled network elements. Because of the competitive alternatives available in the marketplace, competing carriers have the option of obtaining directory assistance from a number of sources. However, if they do not

want to obtain directory assistance from GTE on a resale basis, or from another competing provider, GTE will continue to offer directory assistance directly to their end users.

GTE will also negotiate with those carriers in good faith to provide directory assistance, just as it will for operator services. However, as with access to operator services, it remains the responsibility of the competing carrier to ensure nondiscriminatory access (through dialing 411 or 555-1212) in a facilities-based arrangement.

With respect to the additional issues raised by the Commission, GTE agrees that nondiscriminatory access to directory listings by LECs means that all customers of telecommunications services providers must be able to access any local service provider's directory assistance service and obtain a directory listing in the same manner. (§ 217) GTE currently complies with this requirement. GTE further believes that 411 and 555-1212 are sustainable dialing patterns to permit any end user to reach the directory assistance service provided by its subscribed local carrier.

Dialing Delays. To comply with the 1996 Act's prohibition on "unreasonable dialing delays,"¹⁸ the Commission seeks comment on the appropriate definition of the term "dialing delay" and the appropriate methods for measuring and recording

¹⁸ See § 251(b)(3).